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February 15, 2023

The Honorable Margo K. Brodie United States District Court Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

By U.S. Mail and ECF (letter only)

Re: <u>United States v. Steven Nerayoff--Crim. No. 20-008 (MKB)</u>

Dear Judge Brodie:

Accompanying this letter is a courtesy copy of Mr. Nerayoff's February 13, 2023 motion papers which include all the exhibits filed via ECF, but in unredacted form, and a flash drive which includes pdfs of the ECF filed exhibits¹, the unredacted exhibits provided this date and copies of video and audio recordings which cannot be filed via ECF. The unredacted versions of documents that were filed in ECF are labelled "Courtesy Copy-original was electronically filed and assigned document __."

As the unredacted versions of the exhibits contained in the spiral bound copy and the flash drive, as well as the video and audio recordings contained therein, would reveal the identities of the alleged victims "John Doe," "Jane Doe" and "Company 1," I am requesting that the Court order the unredacted documents contained in the bound hardcopy and the flash drive sealed until further order of this Court.

Respectfully submitted,

Michael A. Scatta

cc: Counsel for the Government via ECF and US mail

¹ The gap between exhibit 20 and 22 was unintentional, there is no Exhibit 21 referenced in our papers.